

**IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF TEXAS  
HOUSTON DIVISION**

GRANT PRIDECO, INC., REEDHYCALOG  
UK, LTD., REEDHYCALOG, LP,  
NATIONAL OILWELL VARCO, LP,

*Plaintiffs/Counter-Defendants,*

v.

SCHLUMBERGER TECHNOLOGY  
CORP., SMITH INTERNATIONAL, INC.;  
ULTERRA DRILLING TECHNOLOGIES,  
L.P., ROCKBIT INTERNATIONAL  
SUBSIDIARIES, LLC.; VAREL  
INTERNATIONAL ENERGY SERVICES,  
INC., and VAREL INTERNATIONAL  
INDUSTRIES, L.P.,

*Defendants.*

Civil Action No. 4:23-cv-00730

**EXHIBIT A**

**TO**

**PLAINTIFFS' MOTION TO DISMISS AND REMAND**

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FOR THE SOUTHERN DISTRICT OF TEXAS  
HOUSTON DIVISION

GRANT PRIDECO, INC., REEDHYCALOG  
UK, LTD., REEDHYCALOG, LP,  
NATIONAL OIL WELL VARCO, LP,

*Plaintiffs/Counter-Defendants,*

v.

SCHLUMBERGER TECHNOLOGY  
CORP., SMITH INTERNATIONAL, INC.;  
ULTERRA DRILLING TECHNOLOGIES,  
L.P., ROCKBIT INTERNATIONAL  
SUBSIDIARIES, LLC.; VAREL  
INTERNATIONAL ENERGY SERVICES,  
INC., and VAREL INTERNATIONAL  
INDUSTRIES, L.P.,

*Defendants/Counter-Plaintiffs.*

Civil Action No. 4:23-cv-00730

DECLARATION OF TOM ROBERTS  
IN SUPPORT OF  
PLAINTIFFS' MOTION TO DISMISS AND REMAND

1. My name is Tom Roberts and I make this declaration under 28 U.S.C. §1746 in support of Plaintiffs and Counter-Defendants' Motion to Dismiss and Remand.
2. **Exhibit B** to the referenced motion is a true and accurate copy of the *Addendum to Original Agreement Dated September 29, 2006 Between ReedHycalog and Smith International and Patent Cross License Between ReedHycalog and Smith International. FILED UNDER SEAL*
3. **Exhibit C** to the referenced motion is a true and accurate copy of the *ReedHycalog – Schlumberger License Agreement. FILED UNDER SEAL*
4. **Exhibit D** to the referenced motion is a true and accurate copy of the *ReedHycalog – Varel Cross- License Agreement. FILED UNDER SEAL*
5. **Exhibit E** to the referenced motion is a true and accurate copy of the *ReedHycalog – Ulterra Cross- License Agreement. FILED UNDER SEAL*

I declare under penalty of perjury that the foregoing is true and correct. Executed on March 29, 2023.

  
Tom Roberts